
From: kmotley@motleylegal.com <kmotley@motleylegal.com>
Sent: Monday, September 13, 2021 11:39 AM
To: George Schimmel <GSchimmel@Schimmel-Law.com>
Subject: RE: PE Curfew violation stay

Hello Atty, Schimmel,

Thank you for pointing that out. We have filed a corrected 3rd Amended Complaint and the Defendant's have objected to it. So perhaps we should wait to see what the court does on whether or not it chooses to accept or not. If you would like to proceed on the lifting of the stay happy to do that as well. Let me know.

Thanks!
Kim

----- Original Message -----

Subject: PE Curfew violation stay
From: "George Schimmel" <GSchimmel@Schimmel-Law.com>
Date: 9/8/21 3:13 pm
To: "kmotley@motleylegal.com" <kmotley@motleylegal.com>

Ms. Motley,

From my review of the 3rd Amended complaint in the Fed ct matter, it now appears you are no longer challenging the validity of the City's Proclamation of Emergency in that case.

If so, then we should discuss a stipulation which would request that Judge Baker rescind the stay order in muni ct and set the curfew violation matters for trial.

For Fraley, I would imagine you'd want the motion to dismiss scheduled for hearing so as to challenge the PE.

Your thoughts?

Sent from my iPhone